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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**SUNIL DUTT, ON BEHALF OF HIMSELF AND
ALL OTHER PERSONS SIMILARLY SITUATED**
PLAINTIFF

v.

**ABK PETROLEUM CORP., ABC CORP.S NO.S 1-
10 (SAID NAMES BEING UNKNOWN AND
FICTITIOUS), SUNNY SINGH A/K/A SONNY
SINGH, PRABHJIT SINGH, AND KAMALJIT
SINGH**

DEFENDANTS

CIVIL ACTION

DOCKET NO: 18-14117-RMB

**NOTICE OF DEFENDANTS'
OPPOSITION AND CROSS MOTION
SEEKING SANCTIONS PURUANT TO
FED. R. Civ. P. 11 AND 28 USC § 1927
IN RE: PLAINTIFF'S MOTION FOR
SANCTIONS [ECF #45]**

PLEASE TAKE NOTICE that the Defendants, ABK Petroleum Corp., Sunpreet Singh (improperly plead as Sunny Singh a/k/a Sonny Singh), Prabhjit Singh and Kamaljit Singh, will Cross Move before this Court on _____, 2020 at 9:00 a.m. or as soon thereafter as counsel may be heard before the Honorable Renee Marie Bumb, United States District Judge for the District of New Jersey at the United States District Courthouse for the District of New Jersey, US Courthouse, 1 John F. Gerry Plaza, 4th & Cooper Streets, Camden, New Jersey for an Order granting the following relief:

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1. Striking Plaintiff's Motion for Sanctions to the extent that same seeks to reach any result beyond merely confirming the parties' settlement agreement in this matter pursuant to the Fair Labor Standards Act and applicable law.
2. Approving the mutually acceptable and executed Settlement Agreement of the parties in this matter;
3. Finding that Defendants and their Counsel committed no violations of 28 USC § 1927, Fed. R. Civ. P. 37 or Fed. R. Civ. P. 11 in this matter and therefore denying the relief sought by Plaintiff in his Motion for Sanctions;
4. Finding that Plaintiff's Motion for Sanctions violates Fed. R. Civ. P. 11 and is itself worthy of sanctions based upon the arguments and allegations therein which violate the applicable Rule;
5. Finding that Plaintiff's Motion for Sanctions violates 28 U.S.C. § 1927 and is itself worthy of sanctions based upon the arguments and allegations therein which violates the applicable Rule;
6. Entering an Order for Sanctions against Plaintiff's Counsels, Daniel Knox, Esq., and Alexander Kadochnikov, Esq., for Defendants' expenses incurred in preparing and litigating this Motion and the offending filing;
7. Awarding Defendants any other relief which the Court deems just

Defendants and counsel will rely on the attached memorandum of law and Certifications.

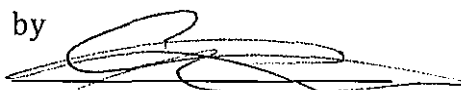
Oral argument is respectfully requested.

Respectfully submitted,

Dated: 7/20/2020

Flynn & Associates, LLC

by



Alex Flynn, Esquire